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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, DC 20554

In the Matter of

Amendment of Section 73.202(b)	)	
Table of Allotments	)	MM Docket No. 99-83
FM Broadcast Stations	)	RM - 9500
(Saranac Lake, New York)	)	

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To: Chief, Allocations Branch  
Policy and Rules Division  
Mass Media Bureau

**COUNTERPROPOSAL**

Westport Broadcasting, licensee of Station WCLX(FM), Westport, New York, by its counsel, submits a Counterproposal to the Notice of Proposed Rule Making (DA 99-543) released March 19, 1999, which proposed the allotment of Channel 276A to Saranac Lake, New York as its fourth local service in response to a petition filed by Dana J. Puopolo. Instead, Westport Broadcasting proposes the (1) substitution of Channel 275A for Channel 273A at Westport along with a modification of license accordingly and (2) the alternative allotment of either Channel 227A or Channel 296A at Saranac Lake instead of Channel 276A. In support hereof, Westport Broadcasting states as follows:

1. Station WCLX currently operates with limited Class A facilities of 250 watts (0.25 kW) and antenna height 102 meters below average terrain (-102 meters HAAT). WCLX has a permit to operate at 650 watts at 90 meters HAAT. WCLX planned to file a one-step application to specify Channel 275A with increased facilities. However the pending proposal to allot Channel

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276A to Saranac Lake would preclude the possibility of WCLX to upgrade on Channel 275A. Therefore, Westport Broadcasting suggests that an alternate channel be allotted to Saranac Lake.

2. Westport Broadcasting hereby states that should the Commission substitute Channel 275A for Channel 273A at Westport and modify its license accordingly, it will file an application for increased facilities on Channel 275A and construct the facility if authorized to do so.

3. The attached channel study indicates that at the specified reference coordinates, Channel 275A can be allotted consistent with Section 73.207 of the Commission's Rules and the U.S./Canadian Treaty. Westport Broadcasting is willing to relocate its transmitter site, if necessary, to operate on Channel 275A in accordance with the Commission's Rules.

#### **SARANAC LAKE**

4. The attached Engineering Statement contains a channel study for Channel 276A which indicates a short spacing of 46.6 km to Channel 276A at Valleyfield, Quebec, Canada<sup>1</sup>. This short spacing will require that the use of Channel 276A must be limited to 350 watts at Saranac Lake in order to avoid prohibited contour overlap in Canadian territory and comply with the treaty. See Figure 2.

5. On the other hand Channel 227A and Channel 296A can be allotted to Saranac Lake with full Class A facilities. See Tables II and III and Figures 3 and 4 of the Engineering Statement. The Engineering Statement indicates that Channel 227A or 296A can provide 60 dBu service to

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1. The Petition for Rule Making submitted by Puopolo did not list Valleyfield. Nevertheless the Commission proposed the allotment noting short spacings to a proposed allotment of Channel 276A at Huntington, Quebec and Channel 276A at Valleyfield. It appears from the Commission's current data base that the Huntington proposal has been withdrawn.

9,819 more persons in an area of 2,032 more sq. km than Channel 276A at Saranac Lake. Thus the alternative channels are superior to Channel 276A as proposed.

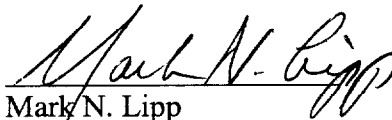
6. When taken together with the increased facilities for WCLX on Channel 275A, the combined total gains are 98,737 persons in an area of 3,850 sq. km. Therefore, Westport Broadcasting's Counterproposal will satisfy the public interest by providing improved service from WCLX on Channel 275A and a superior channel to serve Saranac Lake and its surrounding area.

7. Accordingly, Westport Broadcasting urges the Commission to substitute Channel 275A for Channel 273A at Westport, New York and modify the license of Station WCLX accordingly, and allot either Channel 227A or Channel 296A at Saranac Lake, New York.

Respectfully submitted,

WESTPORT BROADCASTING

By:



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Its Counsel

**ENGINEERING STATEMENT IN  
SUPPORT OF COUNTERPROPOSAL  
TO PETITION FOR RULEMAKING  
PROPOSED CHANNEL 276A SARANAC LAKE, NEW YORK  
RM-9500 DANA PUOPOLO**

**MAY 1999**

**ENGINEERING STATEMENT IN  
SUPPORT OF COUNTERPROPOSAL  
TO PETITION FOR RULEMAKING  
PROPOSED CHANNEL 276A SARANAC LAKE, NEW YORK  
RM-9500 DANA PUOPOLO**

**MAY 1999**

**SUMMARY**

The following comments and counterproposal are submitted on behalf of **Westport Broadcasting** ("**Westport**"), licensee/permittee of FM broadcast station WCLX, Channel 273A, Westport, New York. **Westport** wishes to upgrade its WCLX facility to that of a full, 6 kW, Class A station and would be prevented from achieving that upgrade by a Petition for Rulemaking filed by Dana Puopolo to assign Channel 276A to Saranac Lake, New York. **Westport** will show herein that the proposed Channel 276A assignment at Saranac Lake is short spaced to an allotment for Channel 276A at Valley Field, Quebec and require an accompanying reduction in ERP to prevent prohibited overlap of contours. Either Channel 227A or Channel 296A can be allotted to Saranac Lake with full 6 kW omnidirectional facilities which represents a more efficient utilize of the spectrum. Both alternative channels are superior to Channel 276 as they comply with the U.S./Canadian FM Agreement and allow **Westport** to achieve its goal of a full Class A upgrade for WCLX on Channel 275A.

**SARANAC LAKE, NEW YORK ALLOCATIONS**

Dana Puopolo, petitioner, proposes to allocate Channel 276A to Saranac Lake, New York. *Table I* is an allocation study for the proposed allotment. It is noted that the proposed Channel 276A allotment at Saranac Lake is short spaced by 46.6 km to a vacant allocation at Valley Field, Quebec on Channel 276A. *Figure 1*, attached, depicts the significant prohibited contour overlap associated with the Puopolo proposal for Channel 276A at Saranac Lake, New York. An applicant filing a 301 application for CP at the proposed Saranac Lake reference coordinates would be required to reduce its ERP to 350 watts in order to meet all FCC rules for the grant of a construction permit. *Figure 2*, attached, depicts the Saranac Lake reduced contours for 350 watt operation. It is noted that the proposed 34 dBu F(50,10) interfering contour for Saranac Lake overlaps the Valley Field 54 dBu F(50,50) service contour on U.S. land area. This same condition may be observed on other allocation maps associated with this statement and reflect

the fact that U.S./Canadian agreement, unlike the U.S./Mexican FM agreement, protects stations only to the border and does not allow or require protection of the service contour should it cross into the adjoining country.

**Westport** believes that its counterproposal to specify either Channel 227A or Channel 296A is superior to the Puopolo proposed Channel 276A allotment at Saranac Lake for several reasons:

1. The mutual exclusivity to **Westport's** proposed Channel 275A is removed.
2. Both Channel 227A and Channel 296A meet the requirements of the "Working Agreement For The Allotment And Assignment Of FM Broadcasting Channels Under The Agreement Between The Government Of The United States Of America And The Government Of Canada Relating To The FM Broadcasting Service." See *Tables II and III* and *Figures 3 and 4*, attached. It is noted that *Figures 3 and 4* are based on full class A facilities, 6 kW @ 100 Meter HAAT.
3. Channel 276A is better allotted to non short spaced coordinates associated with a community in Hamilton County, New York. Communities without existing service which could use Ch 276A include Speculator Village, Sabael, Indian Lake, and North river. A set of allotment coordinates meeting all required distance separation are found below:

N.L. 43° 35' 29"  
W.L. 74° 21' 20"

An allocation study for Channel 276A at the above noted allotment coordinates for Hamilton County is attached as *Table IV*. *Figure 5* depicts the non short spaced Ch 276A site area.

### **WESTPORT, NEW YORK CHANNEL 275A ALLOCATION**

**Westport** is currently licensed for operation on Channel 273A with an ERP of 0.25 kW and a HAAT of -102 meters HAAT. The station holds a CP for Channel 273A with an ERP of 0.65 kW and a HAAT of 90 meters, BPH-980410IB, which was granted under *Section 73.215*. The CP site location is a high natural elevation needed to provide viable service in this mountainous area of eastern New York State. **Westport** had planned to file a one step upgrade application for Channel 275A in order to obtain full Class A facilities. The Puopolo petition is mutually exclusive with the planned upgrade. **Westport** believes that the public interest is met by allowing **Westport** to achieve its Channel 275A upgrade in addition to an allotment at Saranac Lake on Channels 227A or 296A. The proposed Channel 275A reference coordinates for **Westport** are:

N.L.	44°	13'	16"
W.L.	73°	24'	42"

*Table V*, attached, is an allocation study for Channel 275A at the proposed reference coordinates. *Figure 6* is an allocation map showing a lack of prohibited contour overlap to CITE, Channel 274C1, Sherbrook, Quebec. It is noted that the F(50,10) 54 dBu contour for CITE is depicted using both the FCC point to point ("PTP") method as set forth in MM Docket No. 98-93, and the standard F(50,10) curves. Based on the PTP method, there is no prohibited overlap to the proposed Channel 275A 60 dBu. With the standard F(50,10) curve, there is overlap which would be removed by application of an ERP restriction to the northwest of 500 watts for the proposed **Westport** allotment coordinates.

*Figure 7* depicts the proposed 70 dBu and 60 dBu contours for Channel 275A operation. *Figure 8* depicts the current CP Channel 273A 70 dBu and 60 dBu contours.

## **AREA AND POPULATION DATA**

**Westport's** counterproposal is summarized as follows:

Add	Channel 275A Westport, NY	
	60 dBu area:	2,770 square kM
	60 dBu population:	104,388 persons
Delete	Channel 273A Westport, NY	
	60 dBu area:	952 square kM (for CP facility)
	60 dBu population:	15,470 persons (for CP facility)
Add	Channel 227A or Ch 296A	Saranac Lake, NY
	60 dBu area:	2,732 square kM
	60 dBu population:	24,330 persons <sup>1</sup>
Delete	Proposed Channel 276A	Saranac Lake, NY
	60 dBu area:	700 square kM
	60 dBu population:	14,511 persons <sup>2</sup>

Total Gain Associated

With Counterproposal:	3,850 square kM
	98,737 persons

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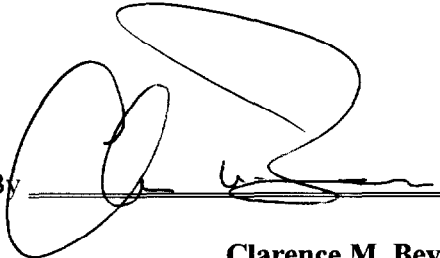
<sup>1</sup> Area and population from full class A, Figure 1

<sup>2</sup> Area and population from 0.35 Kw Class A. Figure 2



**CONCLUSION**

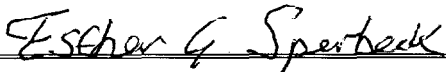
The foregoing was prepared on behalf of **Westport Broadcasting** by Clarence M. Beverage of *Communications Technologies, Inc.*, Marlton, New Jersey, whose qualifications are a matter of record with the Federal Communications Commission. The statements herein are true and correct of his own knowledge, except such statements made on information and belief, and as to these statements he believes them to be true and correct.

By  \_\_\_\_\_

**Clarence M. Beverage**  
*for Communications Technologies, Inc.*  
Marlton, New Jersey

**SUBSCRIBED AND SWORN TO** before me,

this 7th day of May, 1999,

 \_\_\_\_\_ NOTARY PUBLIC

**ESTHER G. SPERBECK**  
**NOTARY PUBLIC OF NEW JERSEY**  
**MY COMMISSION EXPIRES OCT. 15, 2002**

**TABLE I**  
**ALLOCATION STUDY CHANNEL 276A SARANAC LAKE, NEW YORK**  
**MAY 1999**

Search of channel 276A6 (103.1 MHz), at N. 44 19 48, W. 74 8 0.

CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	CLEARANCE
=====									
ALC	Westport	NY	273	A	U	57.3	31.0	105.8°	26.3
WCLX	Westport	NY	273	A	C	59.0	31.0	101.9°	28.0
WCLX	Westport	NY	273	A	L	58.0	31.0	106.2°	27.0
ALC	Valleyfield	QU	276	A		104.4	151.0	1.6°	-46.6
CFOUFM	Ste-Therese	QU	276	A1		148.0	131.0	8.6°	17.0
CHAAFM	Longueuil	QU	276	A1		139.4	131.0	21.5°	8.4
ALC	Carthage	NY	276	A	U	134.3	115.0	251.9°	19.3
ALC	Saranac Lake	NY	276	A	A	0.0	115.0	0.0°	-115.0
WTOJ	Carthage	NY	276	A	L	134.3	115.0	251.9°	19.3
ALC	Royalton	VT	276	A	U	144.5	115.0	117.4°	29.5
WRJT	Royalton	VT	276	A	L	152.1	115.0	113.9°	37.1
CBOFM	Ottawa	ON	277	C1		188.1	168.0	313.9°	20.1
CBOFM1	Ottawa	ON	277	C1		188.1	168.0	313.9°	20.1
ALC	Waterbury	VT	277	C3	U	109.5	89.0	78.4°	20.5
WGLYFM	Waterbury	VT	277	C3	L	95.9	89.0	87.7°	6.9

**TABLE II**  
**ALLOCATION STUDY ALTERNATE CH 227A SARANAC LAKE, NEW YORK**  
**MAY 1999**

Search of channel 227A6 (93.3 MHz), at N. 44 19 48, W. 74 8 0.

CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	CLEARANCE
ALC	Burlington	VT	225	C	U	107.2	95.0	78.2°	12.2
WEZF	Burlington	VT	225	C	L	107.2	95.0	78.2°	12.2
ALC	Watertown	NY	227	A	U	143.2	115.0	253.1°	28.2
WCIZFM	Watertown	NY	227	A	L	143.2	115.0	253.1°	28.2
CBMFM	Montreal	QU	228	C1		137.4	168.0	18.1°	-30.6 *
ALC	Addison	VT	229	A	U	62.2	31.0	121.0°	31.2

\* See Figure 3

**TABLE III**  
**ALLOCATION STUDY ALTERNATE CHANNEL 296A SARANAC LAKE, NEW YORK**  
**MAY 1999**

Search of channel 296A6 (107.1 MHz), at N. 44 19 48, W. 74 8 0.

CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	CLEARANCE
=====									
WVNV	Malone	NY	243	C3	A	50.7	12.0	352.3°	38.7
ALC	Vergennes	VT	294	C2	U	71.1	55.0	91.7°	16.1
WIZN	Vergennes	VT	294	C2	L	71.1	55.0	91.7°	16.1
CKQB	Ottawa	ON	295	C1		188.1	168.0	313.9°	20.1
ALC	Hudson Falls	NY	296	A	U	119.8	115.0	164.8°	4.8
WHTR	Hudson Falls	NY	296	A	C	124.1	115.0	166.4°	9.1
WHTR	Hudson Falls	NY	296	A	L	119.8	115.0	164.8°	4.8
ALC	Barre	VT	296	A	U	133.5	115.0	98.2°	18.5
WORK	Barre	VT	296	A	L	133.5	115.0	98.2°	18.5
CITEFM	Montreal	QU	297	C1		137.4	168.0	18.1°	-30.6 *

\* See Figure 4

**TABLE IV**  
**ALLOCATION STUDY CHANNEL 276A HAMILTON COUNTY, NEW YORK**  
**MAY 1999**

Search of channel 276A6 (103.1 MHz), at N. 43 35 29, W. 74 21 20.

CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	CLEARANCE
=====									
ALC	Old Forge	NY	223	A	V	51.6	10.0	285.0°	41.6
CBOFFM	Ottawa	ON	273	C1		243.4	90.0	330.8°	153.4
CBOFFM	Ottawa	ON	273	C1		243.4	90.0	330.8°	153.4
ALC	Rome	NY	273	B	U	107.7	69.0	235.1°	38.7
ALC	Westport	NY	273	A	U	99.0	31.0	47.8°	68.0
NEW	Rosendale	NY	273	A	A	190.7	31.0	171.0°	159.7
WCLX	Westport	NY	273	A	C	103.2	31.0	47.4°	72.2
WCLX	Westport	NY	273	A	L	99.0	31.0	48.3°	68.0
WSKS	Rome	NY	273	B	L	107.7	69.0	235.1°	38.7
CITE-1	Sherbrooke	QU	274	C1		254.7	99.0	41.3°	155.7
CITE13	Sherbrooke	QU	274	C1		254.7	99.0	41.3°	155.7
CITE14	Sherbrooke	QU	274	C1		254.7	99.0	41.3°	155.7
ALC	Cape Vincent	NY	274	A	U	169.8	31.0	288.3°	138.8
WBDR	Cape Vincent	NY	274	A	L	169.8	31.0	290.1°	138.8
ALC	Manchester	VT	274	B	U	111.0	69.0	115.2°	42.0
WEQX	Manchester	VT	274	B	L	111.0	69.0	115.2°	42.0
ALC	Syracuse	NY	275	B	U	165.0	113.0	245.1°	52.0
ALC	Morristown	NY	275	A	U	151.7	72.0	316.9°	79.7
ALC	Narrowsburg	NY	275	A	A	223.8	72.0	193.6°	151.8
WMHR	Syracuse	NY	275	B	L	165.0	113.0	245.1°	52.0
WMHR	Syracuse	NY	275	B	C	165.0	113.0	245.1°	52.0
WNCQFM	Morristown	NY	275	A	L	143.7	72.0	319.8°	71.7
CFMXFM	Cobourg	ON	276	C1		309.3	243.0	279.9°	66.3
ALC	Joliette	QU	276	A		279.2	151.0	15.1°	128.2
ALC	Valleyfield	QU	276	A		187.5	151.0	6.3°	36.5
CFOUFM	Ste-Therese	QU	276	A1		231.9	131.0	9.9°	100.9
CHAAFM	Longueuil	QU	276	A1		222.7	131.0	18.1°	91.7
ALC	Albany	NY	276	A	U	117.0	115.0	151.8°	2.0
ALC	Oneonta	NY	276	A	U	142.3	115.0	204.4°	27.3
ALC	Carthage	NY	276	A	U	117.7	115.0	290.0°	2.7
ALC	Saranac Lake	NY	276	A	A	84.0	115.0	12.3°	-31.0 <sup>1</sup>
WHRL	Albany	NY	276	A	L	117.0	115.0	151.8°	2.0
WTOJ	Carthage	NY	276	A	L	117.7	115.0	290.0°	2.7
WZOZ	Oneonta	NY	276	A	L	142.3	115.0	204.4°	27.3
ALC	Royalton	VT	276	A	U	147.9	115.0	83.9°	32.9

TABLE IV

~ 2 ~

CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	CLEARANCE
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
WRJT	Royalton	VT	276	A	L	159.1	115.0	82.7°	44.1
CBOFM	Ottawa	ON	277	C1		243.4	168.0	330.8°	75.4
CBOFM1	Ottawa	ON	277	C1		243.4	168.0	330.8°	75.4
ALC	Waterbury	VT	277	C3	U	163.3	89.0	50.4°	74.3
WGLYFM	Waterbury	VT	277	C3	L	143.0	89.0	53.1°	54.0
ALC	Cobleskill	NY	278	B	U	69.6	69.0	189.1°	0.6
WQBJ	Cobleskill	NY	278	B	L	69.6	69.0	189.1°	0.6
CHXL	Brockville	ON	279	C1		157.7	90.0	304.7°	67.7
ALC	Keene	NH	279	B	U	174.1	69.0	111.5°	105.1
WKNEFM	Keene	NH	279	B	L	174.1	69.0	111.5°	105.1
WKNEFM	Keene	NH	279	B	L	172.8	69.0	111.0°	103.8

<sup>1</sup> To channel 227A or Channel 296A

**TABLE V**

**ALLOCATION STUDY CHANNEL 275A WESTPORT, NEW YORK**

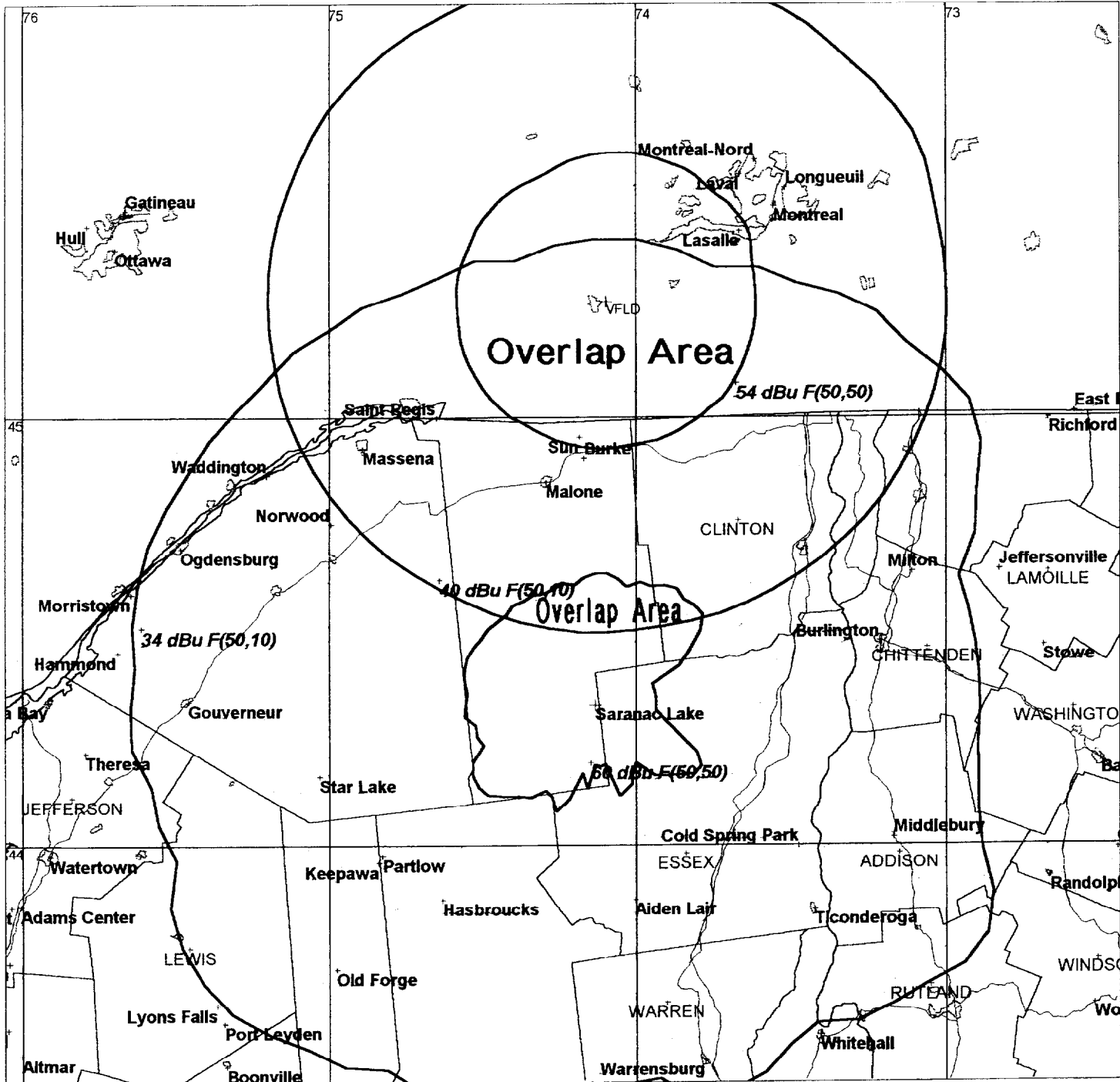
**MAY 1999**

Search of channel 275A6 (102.9 MHz), at N. 44 13 16, W. 73 24 42.

CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	CLEARANCE
=====									
ALC	Port Henry	NY	221	C3	U	22.3	12.0	194.6°	10.3
WXNT	Port Henry	NY	221	C3	L	22.3	12.0	194.6°	10.3
ALC	St. Albans	VT	272	A	U	68.2	31.0	23.9°	37.2
WLFE	St. Albans	VT	272	A	L	68.2	31.0	23.9°	37.2
ALC	Westport	NY	273	A	U	4.3	31.0	216.0°	-26.7 1
WCLX	Westport	NY	273	A	C	0.2	31.0	111.7°	-30.8 1
WCLX	Westport	NY	273	A	L	4.5	31.0	205.1°	-26.5 1
CITE-1	Sherbrooke	QU	274	C1		152.5	168.0	37.4°	-15.5 2
CITE13	Sherbrooke	QU	274	C1		152.5	168.0	37.4°	-15.5 2
CITE14	Sherbrooke	QU	274	C1		152.5	168.0	37.4°	-15.5 2
ALC	Manchester	VT	274	B	U	119.6	113.0	168.5°	6.6
WEQX	Manchester	VT	274	B	L	119.6	113.0	168.5°	6.6
ALC	Portland	ME	275	C	U	236.3	226.0	98.0°	10.3
WBLM	Portland	ME	275	C	C	253.2	226.0	101.7°	27.2
WBLM	Portland	ME	275	C	C	251.3	226.0	96.9°	25.3
WBLM	Portland	ME	275	C	L	236.3	226.0	98.0°	10.3
ALC	Valleyfield	QU	276	A		128.5	98.0	335.0°	30.5
ALC	Saranac Lake	NY	276	A	A	58.9	72.0	281.9°	-13.1 3
ALC	Royalton	VT	276	A	U	89.1	72.0	127.6°	17.1
WRJT	Royalton	VT	276	A	L	95.2	72.0	121.4°	23.2
ALC	Waterbury	VT	277	C3	U	60.5	42.0	55.6°	18.5
WGLYFM	Waterbury	VT	277	C3	L	41.5	42.0	67.4°	-0.5

NOTES:    1. To be deleted  
             2. See Figure 6  
             3. To channel 227A or 296A

FIGURE 1 CH 276A SARANAC LAKE, NY &amp; VALLEY FIELD, QU



Communications Technologies, Inc. Marlton, NJ May 1999

**Scale 1:1500000.**

50 Km

**FM Service**

### FM Interfering

County Borders

### - Highways

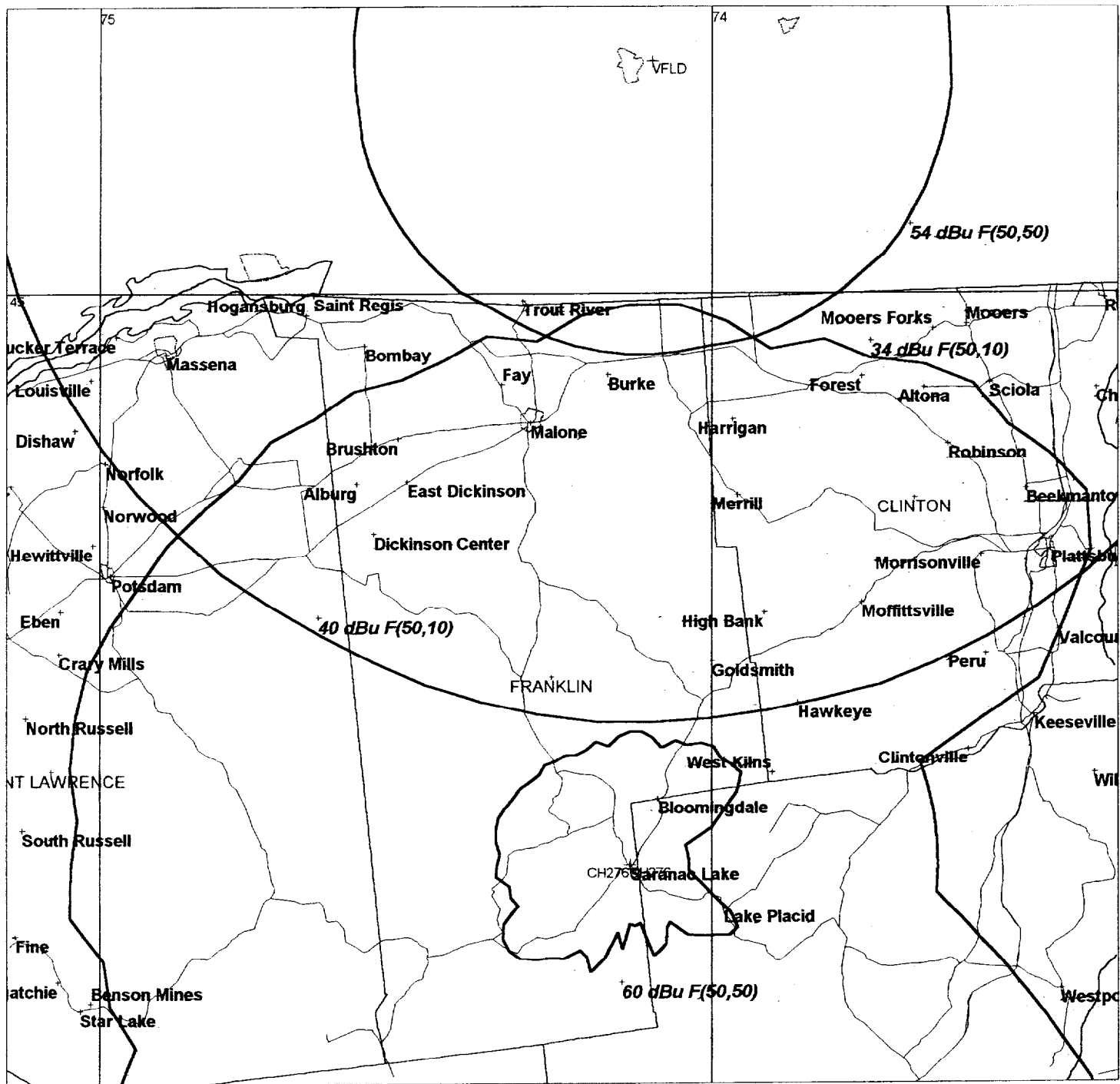
### State Borders

### --- Lat-Lon Grids

- *City Borders*



FIGURE 2 CH 276A REDUCED TO 0.35 KW TO REMOVE OVERLAP



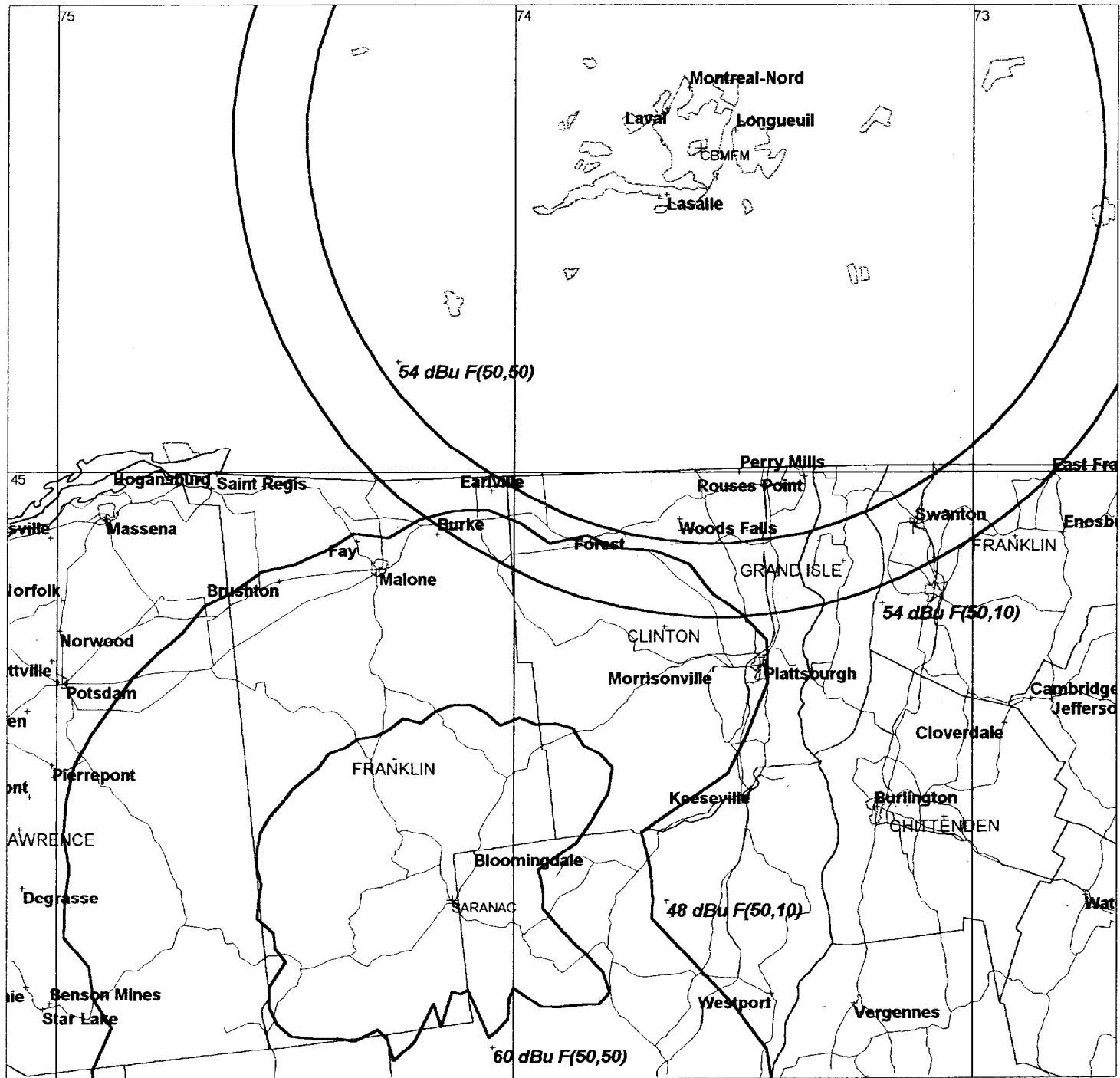
Communications Technologies, Inc. Marlton, NJ May 1999

Scale 1:749900

25 Km

— FM Service — FM Interfering — County Borders — Highways — State Borders — Lat-Lon Grids — City Borders

FIGURE 3 SARANAC LAKE CH 227A TO CBMFM CH 228C1

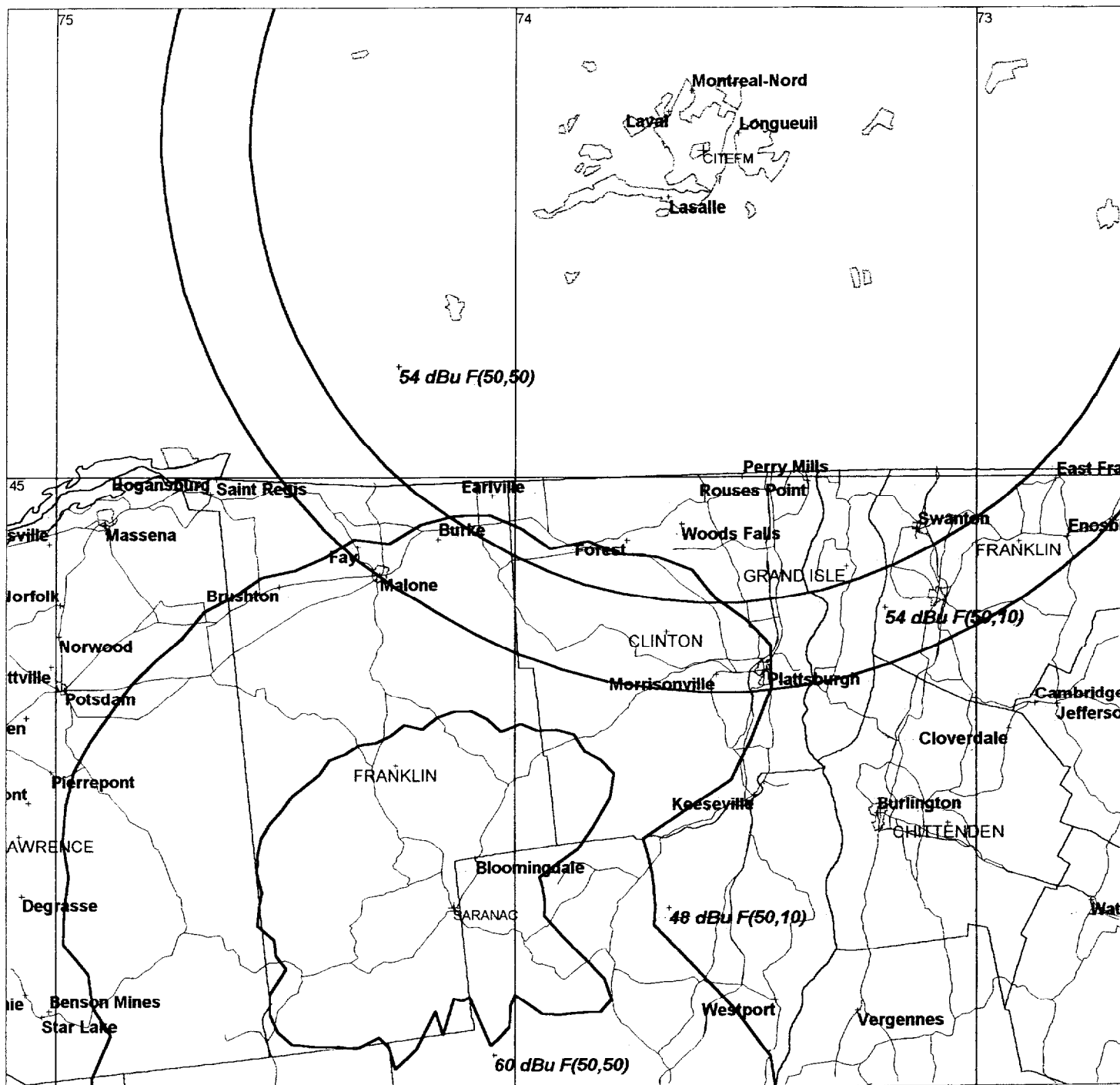


Communications Technologies, Inc. Marlton, NJ May 1999

Scale 1:999900

— AM City Day    — FM Service    — FM Interfering    — TV Grade 'B'    — County Borders    — Highways    — State Borders  
 - - - Lat-Lon Grids    — City Borders

FIGURE 4 SARANAC LAKE CH 296A TO CITEFM CH 297C1



Communications Technologies, Inc. Marlton, NJ May 1999

Scale 1:999900

50 Km

— AM City Day — FM Service — FM Interfering — TV Grade 'B' — County Borders — Highways — State Borders  
 --- Lat-Lon Grids --- City Borders

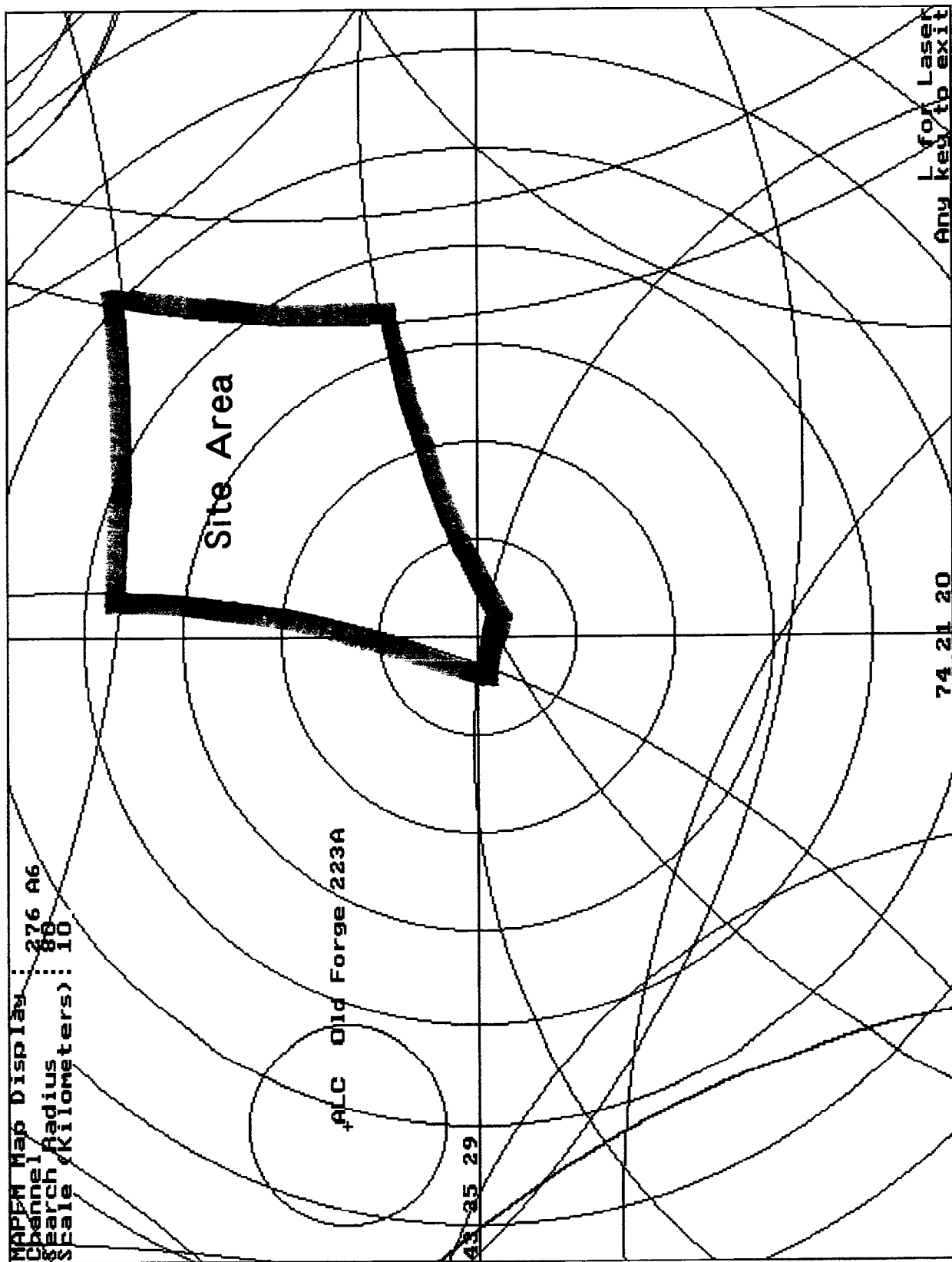
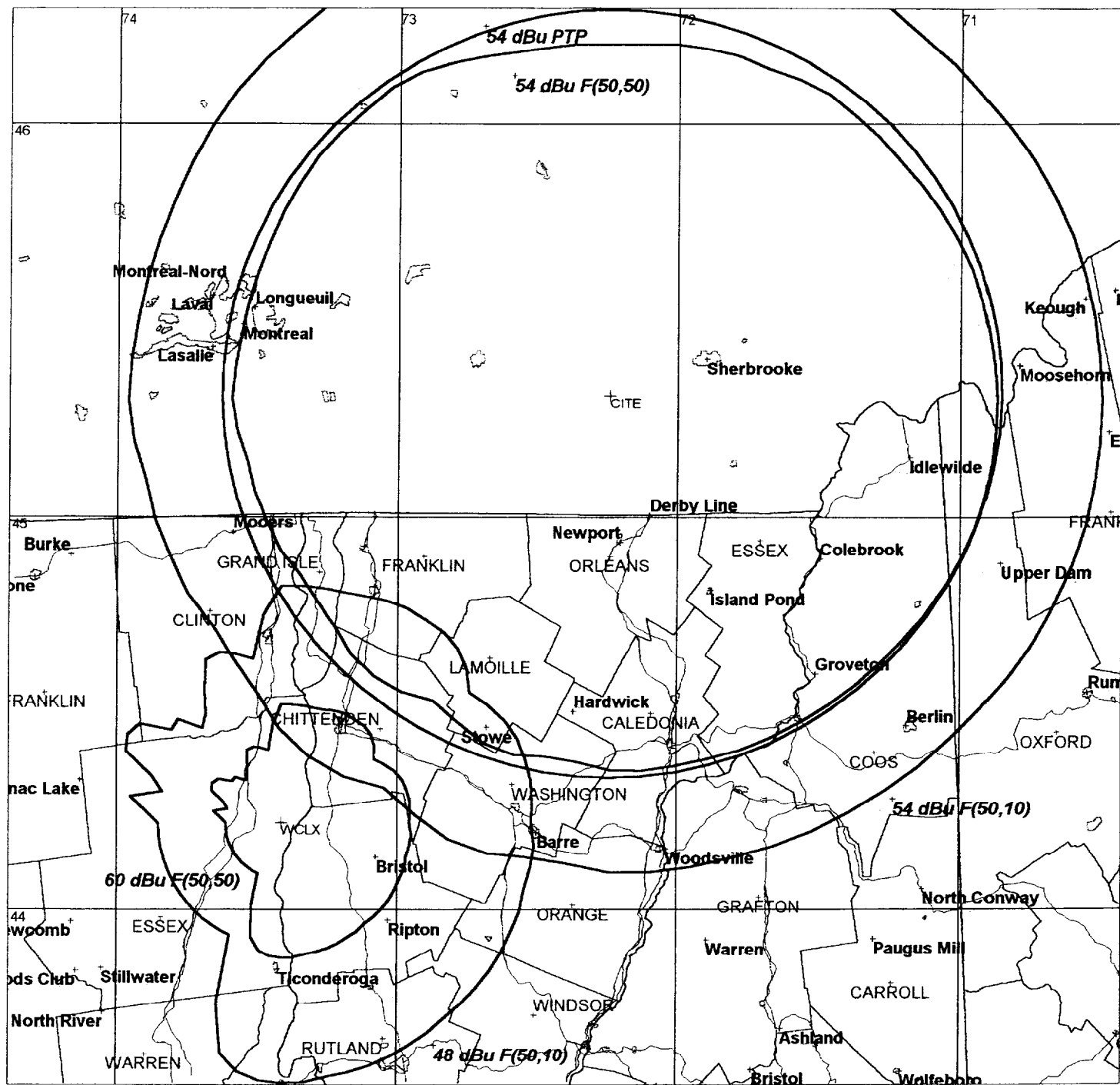


Figure 5

FIGURE 6 CH 275A WESTPORT, NY AND CITE CH 274C1



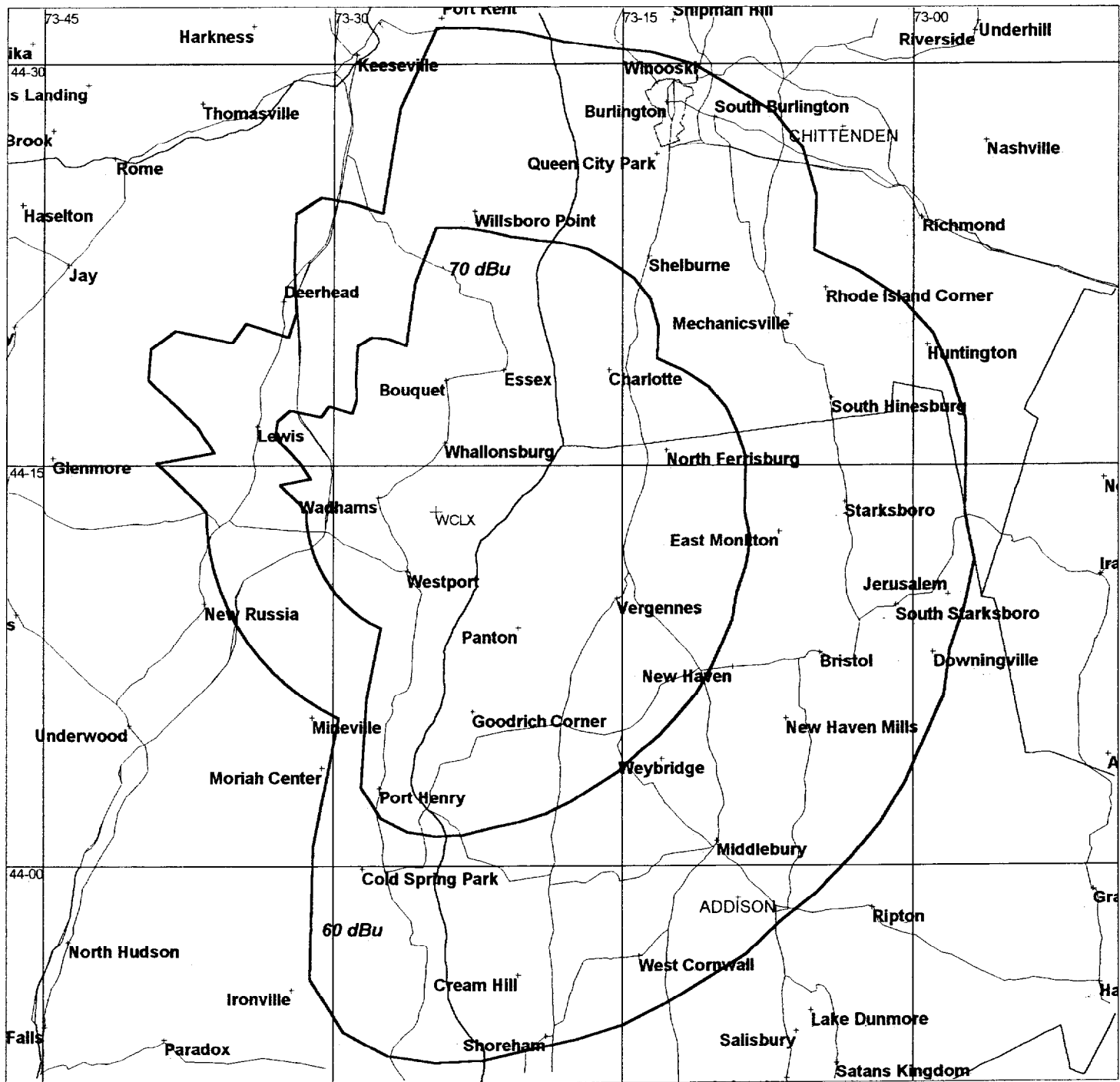
Communications Technologies, Inc. Marlton, NJ May 1999

Scale 1:1633000

50 Km

--- AM City Day    --- FM Service    --- FM Interfering    --- TV Grade 'B'    --- County Borders    --- Highways    --- State Borders  
 --- Lat-Lon Grids    --- City Borders

FIGURE 7 CH 275A WESTPORT, NY F(50,50) 6 kW 100 M HAAT



Communications Technologies, Inc. Marlton, NJ May 1999

Scale 1:400000

10 Km

— AM City Day  
— City Borders

— FM Service

— TV Grade 'B'

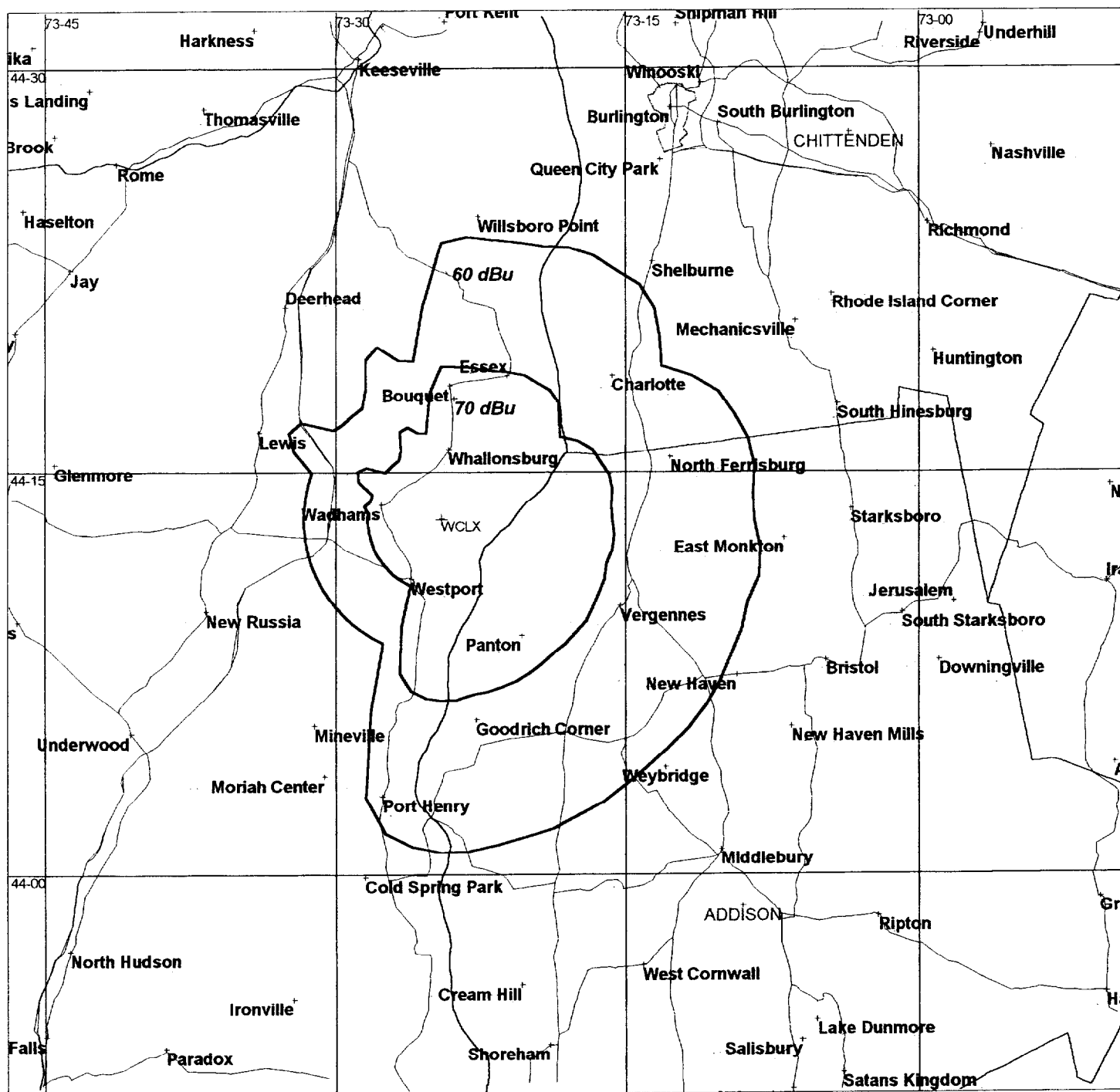
— County Borders

— Highways

— State Borders

--- Lat-Lon Grids

FIGURE 8 CH 273A WESTPORT, NY F(50,50) 0.6 kW



Communications Technologies, Inc. Marlton, NJ May 1999

Scale 1:400000

10 Km

— AM City Day  
— City Borders

— FM Service

— TV Grade 'B'

— County Borders

— Highways

— State Borders

— Lat-Lon Grids

**CERTIFICATE OF SERVICE**

I, Lisa M. Balzer, a secretary in the law firm of Shook, Hardy & Bacon, do hereby certify that I have on this 10th day of May, 1999 caused to be mailed by first class mail, postage prepaid, copies of the foregoing "**Counterproposal**" to the following:

\* Ms. Leslie K. Shapiro  
Allocations Branch  
Federal Communications Commission  
Mass Media Bureau  
445 12th Street, SW  
Room 3-A501  
Washington, DC 20554

Dana J. Puopolo  
37 Martin Street  
Rehoboth, MA 02769-2103

\* HAND DELIVERED

  
Lisa M. Balzer